

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

Next Communications, Inc. and NxtGn, Inc.,

Plaintiffs,

v.

Viber Media S.à r.l.,

Defendant.

Civil No. 1:14-CV-8190 (RJS)

**DEFENDANT VIBER MEDIA S.À R.L.'S
NOTICE OF MOTION FOR AN ORDER GRANTING DEFENDANT LEAVE TO
FILE UNREDACTED VERSIONS OF: (i) "DEFENDANT VIBER MEDIA S. À R.L.'S
MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO DISMISS
PLAINTIFFS' AMENDED COMPLAINT FOR FAILURE TO STATE A CLAIM
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6); AND
DEFENDANT'S POSITION ON JURISDICTION AND VENUE",
AND (ii) PLAINTIFFS' AMENDED COMPLAINT AND
ORIGINAL COMPLAINT INCLUDED AS EXHIBITS THERETO**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all other proceedings had herein, Defendant Viber Media S. à r.l. ("Viber") moves this Court, before the Honorable Richard J. Sullivan, United States District Judge, for an order granting Defendant leave to file unredacted versions of: (i) "Defendant Viber Media S. à r.l.'s Memorandum of Law in Support of Its Motion to Dismiss Plaintiffs' Amended Complaint for Failure to State a Claim Pursuant to Federal Rule of Civil Procedure 12(b)(6); and Defendant's Position on Jurisdiction and Venue", and (ii) unredacted versions of Plaintiffs' Amended Complaint attached as an exhibit thereto and the Original Complaint attached as an exhibit to the Declaration of Susan M. Schlesinger submitted in connection therewith. Viber respectfully moves pursuant to the presumption of open records in the Court and pursuant to the Court's Order of March 13, 2015 (Dkt. #28).

In view of the foregoing, Viber respectfully seeks leave to file with the Court unredacted versions of the above-mentioned documents, and for such further relief that the Court deems just and proper.

Dated: New York, New York
April 20, 2015

Respectfully Submitted,

/s/ Jeffrey P. Weingart
Jeffrey P. Weingart
Jeffrey A. Kimmel
Susan M. Schlesinger
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 20, 2015, a copy of the foregoing Defendant Viber Media S. à r.l.'s Notice of Motion for an Order Granting Defendant Leave to File Unredacted Versions of: (i) "Defendant Viber Media S. à r.l.'s Memorandum of Law in Support of Its Motion to Dismiss Plaintiffs' Amended Complaint for Failure to State a Claim Pursuant to Federal Rule of Civil Procedure 12(b)(6); and Defendant's Position on Jurisdiction and Venue", and (ii) Plaintiffs' Amended and Original Complaints Included as Exhibits Thereto was filed electronically using the Court's electronic filing system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: April 20, 2015

/s/ Susan M. Schlesinger
Susan M. Schlesinger